



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

January 10, 2025

**BY ECF**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re:    *United States v. Nadine Menendez,*  
S4 23 Cr. 490 (SHS)**

Dear Judge Stein:

The Government respectfully encloses in the above-captioned matter a redline to the Court's jury charges as given at the trial of the defendant's co-defendants last year. This redline reflects the Government's present proposed jury charges, with footnotes to explain briefly certain of the Government's proposals or to respond briefly to certain of the defendant's apparent objections in the redline that she filed earlier this evening (Dkt. 696). The Government will provide additional authority or explanation for its proposals, or respond further to the defendant's proposals, upon request.

The Government also respectfully reserves the right to request additional revisions or modifications to the Court's jury charges based on developments at trial, e.g., to request a conscious avoidance charge (*see* Dkt. 354 (Gov't Requests to Charge) at 38-40).

Honorable Sidney H. Stein  
January 10, 2025  
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Respectfully submitted,

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Chief Counsel to the Acting United States Attorney  
Attorney for the United States, Acting under  
Authority Conferred by 28 U.S.C. § 515

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Enclosure

cc: (by ECF)

Counsel of Record